



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

contended that the regulation was unreasonable. On this point the supreme court said:

There is no merit in the contention of appellant that the rule requiring morbidity reports to be made on the 1st day of each month is unreasonable. The purpose of this regulation is to enable the health authorities to take proper and prompt measures for the prevention and spread of disease, and to promote the general health of the people. This regulation is not only reasonable, but it is an important and valuable aid in the preservation of the public health.

The court, however, refused to sustain the conviction and discharged the appellant because of the insufficiency of the evidence, saying:

We think, however, that the testimony in this record is insufficient to sustain this conviction. The offense denounced by the statute is the violation of the regulations of the board of health knowingly, and this evidence wholly failed to show that the defendant had any knowledge of the existence of the rule or regulation, or that there had ever been any such publication thereof as to charge him with knowledge of it. The only attempt to show any sort of publication of the rule, or that the defendant had knowledge thereof, is found in the testimony of Dr. R. W. Hall, who was a witness for the State, and who testified that there was in the office of the State board of health a mailing list consisting of about 13,000 names, including about 1,700 physicians; that the name of Dr. Smythe appeared on this mailing list, and that it was customary to mail the publications of the board to the people whose names appeared on this list. The defendant testified that he had never received a copy of these regulations, and that he had no knowledge of the existence of the rule requiring these reports to be made on the 1st day of the month, and that, prior to the administration of Dr. A. J. Ware as county health officer, it had been the custom in that county to file these reports on or about the 10th day of the month, and that in so doing the physicians were acting under the directions of the county health officers.

There is no presumption that appellant had knowledge of a mere rule or regulation of the State board of health, and under the evidence in this record the peremptory instruction requested by defendant should have been granted.

WIFE ALLOWED DAMAGES AGAINST HUSBAND FOR VENEREAL INFECTION.¹

The North Carolina Supreme Court has affirmed a judgment allowing a wife to recover damages from her husband because he had infected her with a venereal disease. It was argued by the husband that the fact of marriage constituted a bar to the action, but the court held that under the statutes of North Carolina a wife could maintain an action against her husband.

DEATHS DURING WEEK ENDED MAR. 5, 1921.

Summary of information received by telegraph from industrial insurance companies for week ended Mar. 5, 1921. (From the "Weekly Health Index," Mar. 8, 1921, issued by the Bureau of the Census, Department of Commerce.)

Policies in force.....	46, 146, 658
Number of death claims.....	9, 560
Death claims per 1,000 policies in force, annual rate.....	10. 8

¹ Crowell v. Crowell.